

Municipal Buildings, Greenock PA15 1LY

Ref: FD

Date: 7 February 2014

I refer to the Agenda for the meeting of the General Purposes Board to be held on Wednesday 12 February 2014 at 3.00 p.m. and attach paperwork relative to Item 2 (Revised Multi-Access Vehicle Specification) which was not available on the day of issue.

ELAINE PATERSON  
Head of Legal & Democratic Services

Enquiries to – **Fiona Denver**- Tel 01475 712109

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<b>Report To:</b>	<b>General Purposes Board</b>	<b>Date:</b>	<b>12 February 2014</b>
<b>Report By:</b>	<b>Head of Legal Services</b>	<b>Report No:</b>	<b>LA/1132/14/FJ/DS</b>
<b>Contact Officer:</b>	<b>Fraser Jarvie Managing Solicitor</b>	<b>Contact No:</b>	<b>01475 712121</b>
<b>Subject:</b>	<b>Request to revise Multi Access Vehicle Specifications</b>		

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## 1.0 PURPOSE

- 1.1 The purpose of this report is to seek the Board's decision on the Council's policy regarding the vehicle specifications applicable to vehicles licensed as Multi Access Public Hire Taxis following a formal request to consider the matter made by the Board at its meeting on 11 December 2013.

## 2.0 SUMMARY

- 2.1 A consultation was undertaken with all groups and individuals considered to have an interest in changes to the vehicle specifications.
- 2.2 Consultation letters were issued to all Public Hire Taxi Operators, Private Hire Vehicle Operators, licenceholders of the Multi Access Public Hire Taxi licences, care providers within Inverclyde and national authorities on disability issues. An advert was placed in the Greenock Telegraph requesting comments and information was placed on the Council's website. A report was also requested from the Council's Head of Environmental and Commercial Services
- 2.3 A copy of the report from Environmental and Commercial Services forms Appendix 1 to this report. Copies of other responses form Appendix 2 to this report.

## 3.0 RECOMMENDATIONS

It is recommended that:

- 3.1 The General Purposes Board consider this report.
- 3.2 The Board decide to:
- (a) Make no change to the Board's current policy; or
  - (b) Make such amendments to the vehicle specification policy applicable to Multi Access Vehicles that they consider appropriate.
- 3.3 The Board consider placing a time limit on how long licences can be held without having an operational vehicle before the said licence is deemed to have lapsed.

## **4.0 BACKGROUND**

- 4.1 Councillor Ahlfeld had requested that the Board re-visit the decision of the General Purposes Board in January 2011 to grant the use of the Peugeot Premier and vehicles of its generic type on general public hire licences but not on restricted MAV public hire licences.
- 4.2 A report by the Legal Services Manager proposing this request was placed before the Board at its meeting on 11 December 2013.
- 4.3 The Board requested a consultation on the matter and that the Legal Services Manager report back to them at the February Board meeting.

## **5.0 RESPONSES**

- 5.1 There were responses from a number of taxi operators who currently have licences for full sized MAVs:- Cathal McGhee, Paul Travers, John Murdoch, Kathleen Gilchrist, Mark Brown and Stuart Boyd. These are supportive of the Peugeot Premier being permitted to be licensed as a restricted multi access public hire taxi.

Inverclyde Taxis, although not responding specifically to the consultation, have made earlier approaches to the Clerk to the Board supporting the introduction of the Peugeot Premier as a restricted MAV.

- 5.2 In addition there was a response from Inverclyde Council On Disability, who wish to retain the current specifications but suggest the Council do more to ensure all current licences are in use and also promote the use of the Peugeot Premier within the rest of the fleet. There were also responses from Inverclyde Carers Centre, who are opposed to a change in specification, The Spinal Injuries Association and Quarriers.

## **6.0 IMPLICATIONS**

### **Finance**

- 6.1 There are no financial implications.

### **Legal**

- 6.2 There are no legal implications.

### **Human Resources**

- 6.3 There are no Human Resources implications.

### **Equalities**

- 6.4 The provision of Wheelchair Accessible Vehicles fits with the Councils and Boards equality outcomes.

### **Repopulation**

- 6.5 There are no repopulation implications.

AGENDA ITEM NO.

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**Report To:** General Purposes Board

**Date:** 12<sup>th</sup> February 2014

**Report By:** Head of Environmental and Commercial Services

**Report No:**

**Contact Officer:** Jim Bradley

**Contact No:** 01475 714757

**Subject:** Request to Revise Multi Access Vehicle Specification

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## 1.0 PURPOSE

- 1.1 The purpose of this report is to provide information on the taxi trade's request to allow the Peugeot Premier (supplied by Allied Vehicles, Glasgow) and vehicles of its generic type to be licensed as Multi Access Public Hire Taxis.

## 2.0 SUMMARY

- 2.1 Inverclyde Taxis Ltd sought approval from the General Purposes Board (GPB) in January 2011 that the Peugeot Premier be permitted to be licensed as a restricted Multi Access Public Hire Taxi. GPB continued consideration until March 2011 to allow consultation with Inverclyde Council On Disability (ICOD) and allow for various issues to be addressed.
- 2.2 In March 2011 the GPB agreed with the views of ICOD (Appendix 1) and with recommendations brought forward by Environmental and Commercial Services that whilst this type of vehicle was a useful addition to the taxi fleet it was not a suitable replacement for the full size Multi Access Vehicle (MAV) currently licensed on restricted MAV Taxi licenses.
- 2.3 GPB granted use of this type of vehicle on general public hire licences but not on restricted MAV public hire licences.
- 2.4 To date no vehicles of this type have been brought forward for licensing on a general public hire licence.
- 2.5 At GPB September 2013 members of the board asked that the licensing of this type of vehicle be reconsidered.
- 2.6 At present 20 restricted MAV public hire licences are issued within Inverclyde, 10 of which do not have a vehicle operating on them. Some licence holders cite the purchase costs and running costs of full size MAV's as the reason for not bringing vehicles forward for licensing.
- 2.7 There is no time restriction for bringing a vehicle forward as part of the licence condition.
- 2.8 The key positives and negatives between the Peugeot Premier style vehicle and the full size MAV currently licensed are listed at 4.6 in the background information.
- 2.9 ICOD submitted a report after their involvement in the initial demonstration in January 2011. The conditions that were subsequently applied were reflective of their comments.
- 2.10 After the previous demonstration in January 2011 and the subsequent demonstration in October 2013 it is acknowledged that this type of vehicle would be a welcome addition to the Public Hire Taxi fleet in Inverclyde, it is not felt that it could be considered a replacement for the full size MAV Taxis currently operating on restricted licences. Which offer the capability to carry up to four able bodied, one mobility impaired and 16cu ft of luggage space at any time.

- 2.11 Current licence conditions takes account of Department of Transport Guidance issued on February 2010 which states "best practice is for local licensing authorities to adopt the principle of specifying as many different types of vehicle as possible and might usefully set down a range of general criteria leaving it open to the trade to put forward vehicles of their own choice so there can be flexibility for new vehicle types to be readily taken into account." At present Inverclyde allows the Peugeot Premier style MAV to be licensed on 91.6% of their general hire plates.
- 2.12 Neighbouring councils have varying policies with respect to levels of wheelchair accessible vehicles available and vehicle specifications these are detailed at 4.12 in the background information.
- 2.13 Of the 8 councils policies examined, 5 councils do not permit the use of this style of vehicle as a wheelchair accessible taxi, of the 3 that do permit it's use, one has no policy on wheelchair accessible taxis and another is considering a review of their MAV specification.

### **3.0 RECOMMENDATIONS**

- 3.1 That the board consider the positives and negatives outlined at point 4.6 taking into account the views of all stakeholders and consider whether the Peugeot Premier style vehicle is an adequate replacement for the current full size MAV.
- 3.2 That the board consider placing a time limit on how long licenses can be held without having an operational vehicle.

#### 4.0 BACKGROUND

- 4.1 After consideration by the March 2011 GPB the licensed vehicle specification guidelines were amended as below.
- 4.2 That the vehicle specification guidelines be revised to allow MAVs of the generic design illustrated by the Peugeot Premier be permitted to be licensed on non MAV restricted Public Hire licenses if the vehicle has M1 European Community Whole Vehicle Type Approval. The proposed revised guidelines to replace those stated are:

#### Guidelines for Conventional Saloon/Hatchbacks/Estate Cars licensed for Public/Private Hire

- A vehicle will have 4 doors (saloon) or 5 doors (estate and hatchback)
- The vehicle will have a minimum engine capacity of 1600cc
- There will be a minimum rear seat width of 48 inches/122cm
- The minimum seating capacity is four adults in addition to the driver
- The luggage compartment will have a minimum capacity of 16cubic feet/0.45 cubic metres

N.B. Where an estate car is to be operated under a licence the following conditions shall also apply:

- Luggage loaded or placed in the luggage compartment must not protrude above the top of the rear seat
- The luggage compartment must be separated from the passenger compartment by a physical barrier, to prevent luggage entering the passenger compartment, to the reasonable satisfaction of the Council

#### Guidelines for Multi Access Vehicles licensed on Restricted Public Hire Licences

- Vehicle will have a minimum of 4 doors
- Vehicle will have a minimum engine capacity of 1600cc
- Vehicle will carry M1 European Community Whole Vehicle Type Approval
- There will be a minimum seat width of 16 inches/40.5cm for each designated passenger seat
- Vehicle must be capable of carrying one wheelchair passenger and four able bodied adults in addition to the driver at any time
- Luggage compartment will have a minimum capacity of 16 cubic feet/0.45 cubic metres
- Luggage loaded or placed in the luggage compartment must not protrude above the top of the rear seat
- The luggage compartment must be separated from the passenger compartment by a physical barrier, to prevent luggage entering the passenger compartment, to the reasonable satisfaction of the Council

#### Guidelines for Multi Access Vehicles licensed on General Public/Private Hire Licences

- Vehicle will have a minimum of 4 doors
- Vehicle will have a minimum engine capacity of 1600cc
- Vehicle will carry M1 European Community Whole Vehicle Type Approval
- There will be a minimum seat width of 16 inches/40.5cm for each designated passenger seat
- Vehicle must be capable of carrying one wheelchair passenger and one able bodied adult in addition to the driver at any time or four adults in addition to the driver if the vehicle is not being used to carry a wheelchair passenger
- Any luggage carrying facility when the vehicle is being utilised to carry a wheelchair

passenger must be separated from the passenger compartment by a physical barrier to the reasonable satisfaction of the Council

- The vehicle should have a luggage compartment of 16 cubic feet/0.45 cubic metres when not being used to carry a wheelchair passenger
- Luggage loaded or placed in the luggage compartment must not protrude above the top of the rear seat
- The luggage compartment must be separated from the passenger compartment by a physical barrier, to prevent luggage entering the passenger compartment, to the reasonable satisfaction of the Council

### **Notes applying to all Multi Access Vehicles**

All fittings and equipment, whether supplied with the vehicle in its original specification or forming part of the special adaptation of the vehicle, including, without prejudice to the foregoing generality, the taillift (if fitted) and all restraining wheelchair clamps and seatbelt webbings and the wheelchair access ramp (where fitted) shall be included as part of the vehicle tests and inspections carried out by the licensing authority. The tests shall be the standard required by the statutory regulations, where appropriate. On presentation for every Annual or 6 monthly test or during the course of any inspection carried out by the licensing authority, the operator/driver shall demonstrate their wheelchair loading and securing procedure.

- 4.3 To date no vehicles of the small MAV type have been brought forward for licensing on a general public hire licence.
- 4.4 At present 20 restricted MAV public hire licences are issued within Inverclyde, 10 of which do not have a vehicle operating on them. Some licence holders cite the purchase costs and running costs of full size MAV's as the reason for not bringing vehicles forward for licensing.
- 4.5 There is no time restriction for bringing a vehicle forward as part of the licence condition.
- 4.5 At GPB September 2013 the Board asked that the licensing of this type of vehicle be reconsidered.
- 4.6 The key positives and negatives between the Peugeot Premier style vehicle and the full size MAV currently licensed are:

### **Positives of the Peugeot Premier Style Vehicle**

- Significantly reduced purchase costs.
- Significantly reduced running costs.
- Rear access to the taxi allows a reduced ramp gradient when not being loaded from a pavement.
- Allows a greater choice of vehicle type to Operators.
- The reference wheelchair measures 1200 x 1350 x 700mm and these dimensions are used to form the basis of accessibility standards for buses and trains. However, whilst all side loading vehicles meet the requirements for people using a 'reference wheelchair', some people who use heavy or powered wheelchairs, or people who need a significant amount of 'headroom' can find a side-loading MAV difficult to enter. Rear loading vehicles are understood to be more likely to be able to accommodate them.
- All passengers should either face forward or backwards but never sideways. With side loading vehicles the wheelchair user has to enter the vehicle and then does a ninety degree turn. Some people need assistance from the driver in order to achieve this turn and it can be an awkward manoeuvre for passenger and driver alike. Rear loading vehicles remove the need for this manoeuvre.

### Negatives of the Peugeot Premier Style Vehicle

- Significantly reduced interior space.
  - Can carry a maximum of two able bodied passengers in addition to the wheelchair user, in the case of a wheelchair user in a larger style powered chair this would be reduced to one able bodied passenger.
  - When carrying a passenger using a wheelchair there is no capacity to have a segregated luggage compartment within the vehicle. This could result in goods/luggage being carried in the passenger compartment increasing the risk of injury in the event of a collision or sharp braking.
  - Loading of passengers requires to take place from the road.
  - Several authoritative national organisations such as RADAR (Royal Association for Disability Rights), SCOPE (SCOPE UK – Disability Charity), Disabled Person's Transport Advisory Committee and SIA (Spinal Injuries Association) have had policies (SIA appendix 3) advising against rear loading wheelchair MAVs being used as taxis. Their main concerns revolve around wheelchair users being in the road when entering and leaving the vehicle, drivers not being confident in assisting the wheelchair user on/off the kerb, and passengers being seated in the 'crumple zone' near the back of the vehicle. They highlight other practical problems such as rear loading vehicles taking up additional scarce rank space, and lack of alternative emergency exits for wheelchair users in the event of an accident.
  - There could be concerns that because rear loading vehicles are cheaper than side loading vehicles over the passage of time the entire fleet may become rear loading. As rear loading vehicles are smaller this would lead to a loss of amenity for members of the public that require to use a larger style MAV on a regular basis.
- 4.7 ICOD submitted a report after their involvement in the initial demonstration in January 2011. The conditions that were subsequently applied were reflective of their comments.
- 4.8 After the previous demonstration in January 2011 and the subsequent demonstration in October 2013 it is acknowledged that this type of vehicle would be a welcome addition to the Public Hire Taxi fleet in Inverclyde, it is not felt that it could be considered a replacement for the full size MAV Taxis currently operating on restricted licences. Which offer the capability to carry up to four able bodied, one mobility impaired and 16cu ft of luggage space at any time.
- 4.9 Current licence conditions takes account of Department of Transport Guidance issued on February 2010 which states "best practice is for local licensing authorities to adopt the principle of specifying as many different types of vehicle as possible and might usefully set down a range of general criteria leaving it open to the trade to put forward vehicles of their own choice so there can be flexibility for new vehicle types to be readily taken into account." At present Inverclyde allows the Peugeot Premier style MAV to be licensed on 91.6% of their general hire plates.
- 4.10 Neighbouring councils have varying policies with respect to levels of wheelchair accessible vehicles available and vehicle specifications these are detailed below:
- Renfrewshire Council – General hire fleet 100% wheelchair accessible, Peugeot Premier style vehicle permitted.
  - North Ayrshire Council – General hire fleet % of wheelchair accessible vehicles unknown, Peugeot Premier does not meet their vehicle specification for wheelchair accessible vehicles.
  - South Ayrshire Council – General hire fleet 100% wheelchair accessible, Peugeot Premier does not meet their vehicle specification for wheelchair accessible vehicles.
  - North Lanarkshire Council – Split into North, Central and South sectors. North sector Public Hire Fleet is 100% wheelchair accessible, Peugeot Premier does not meet their vehicle specification, full size MAV's only. Central Sector Public Hire Fleet % wheelchair



accessible unknown, Peugeot Premier does not meet their MAV vehicle specification, full size MAV's only. In addition all public hire vehicles require to be fitted with a swivel seat to assist passenger access and egress. South Sector Public Hire Fleet % wheelchair accessible unknown, Peugeot Premier does not meet their MAV vehicle specification, full size MAV's only. In addition all public hire vehicles require to be fitted with a swivel seat to assist passenger access and egress.

- West Dunbartonshire Council - Split into Clydebank and Dumbarton sectors. Clydebank sector Public Hire Fleet is 100% wheelchair accessible, Peugeot Premier meets their vehicle specification. Dumbarton sector Public Hire Fleet % wheelchair accessible unknown, they don't have any restricted licences for wheelchair accessible vehicles therefore the Peugeot Premier would be permitted whether wheelchair accessible or not.
- East Renfrewshire Council - Public Hire Fleet 0.8% wheelchair accessible. At present they don't have a policy on wheelchair accessible vehicles and as such the Peugeot Premier would be permitted to be licensed as a Public Hire or Private Hire whether converted for wheelchair accessibility or not.
- Edinburgh City Council - Public Hire Fleet 100% wheelchair accessible. Peugeot Premier style vehicle does not meet their vehicle specification. Peugeot Premier style vehicle approved for use on private hire vehicles.
- Glasgow City Council - Public Hire Fleet 100% wheelchair accessible. Peugeot Premier style vehicle does not meet their vehicle specification. Peugeot Premier style vehicle approved for use on private hire vehicles.

4.11 Of the 8 councils stated above, 5 councils do not permit the use of this style of vehicle as a wheelchair accessible taxi, of the 3 that do permit it's use, one has no policy on wheelchair accessible taxis and another has intimated that they will be conducting a review of their specification in the near future.

CATHAL MCGHEE

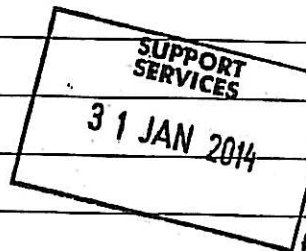


PLATE N° 75

To whom it may concern

I would like to put forward a proposal for the forthcoming meeting to use one of the smaller wheelchair accessible vehicles that are going to be considered at february 12<sup>th</sup> meeting. I have found it uneconomical to purchase and operate the E7 or any of the other large vehicles. So I am hoping that if this gets passed I can then go ahead and purchase such a vehicle.

Many thanks

**Diane Sweeney**

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**From:** Fraser Jarvie  
**Sent:** 03 February 2014 17:08  
**To:** Diane Sweeney  
**Subject:** FW: Consultation WAV General Hire Licence

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**From:** Paul Travers  
**Sent:** 18 January 2014 22:50  
**To:** Fraser Jarvie  
**Subject:** Consultation WAV General Hire Licence

Fraser Jarvie

As the holder of two multi access vehicle licence I have been made aware that the council will be considering allowing the Peugeot Premier to be licenced in the Inverclyde area at the GPB meeting in December.

As the operator of these licences I was unaware that the conditions on the licence had changed. The original licence granted by the board allowed the use of a vehicle that was suitable for the carriage of one wheelchair user or four able bodied passengers..

Allowing the use of the Peugeot Premier would make operating the fleet of restricted licences more affordable to operators. Peugeot Premiers costing £15995 compared to the Peugeot e7 £32K.

It would also make vehicles more readily available to wheelchair users in the Inverclyde area with the demand for larger vehicles being met by operators who want to work cruise liners and out of town work with more than four passenger.

Paul Travers  
P-T Transport

**Fraser Jarvie**

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**From:** JOHN MURDOCH  
**Sent:** 06 December 2013 17:54  
**To:** Fraser Jarvie  
**Subject:** taxi

Hi Fraser,

We are writing to you regarding the council considering allowing the Peugeot Premier Taxi to be operated within inverclyde.

We write to ask the council to consider allowing the MPV operators the opportunity to operate this vehicle too and feel that this would benefit wheelchair passengers.

Yours sincerely

Mr John Murdoch plate 233

Mrs Kathleen Gilchrist plate 230

**Diane Sweeney**

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**From:** JOHN MURDOCH  
**Sent:** 13 January 2014 14:27  
**To:** Diane Sweeney  
**Subject:** Fwd: Wheelchair accessible vehicles

Hi Diane,

Please see attached email.

Kind regards

John

----- Forwarded message -----

**From:** JOHN MURDOCH  
**Date:** 12 January 2014 10:52  
**Subject:** Wheelchair accessible vehicles  
**To:** [fraser.jarvie@inverclyde.gov.uk](mailto:fraser.jarvie@inverclyde.gov.uk)

Hi Fraser.

I would like the board to allow the MPV licence holders to have the option to operate the smaller type of vehicle as we were allowed to operate a smaller vehicle when the licences were issued.

I was not made aware of any changes to my licence regarding only being allowed to operate the larger vehicle, the other licence holders will highlight this to you ?.

Fraser to have the choice to operate either the large or the small vehicle would benefit the operator and the wheelchair users.

As of previous email that I sent to you regarding the costs of the vehicles and the maintenance it would benefit to have the smaller vehicle option in place this would help if i had to replace my vehicle suddenly.

There was four of the ten licences that are not operational had made inquirers to purchase the smaller vehicle had they been passed at the last meeting.

Kind regards

Mr John Murdoch

Diane Sweeney

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From: Mark Brown  
Sent: 06 February 2014 16:21  
To: Diane Sweeney  
Subject: Reply to consolation letter

I mark brown would like to put my name forward to be consider to use one of the smaller disabled vehicles has I found the larger ones were uneconomical to run and also to expensive to purchase many thanks mark plate no 131 contact

Sent from Yahoo Mail for iPhone

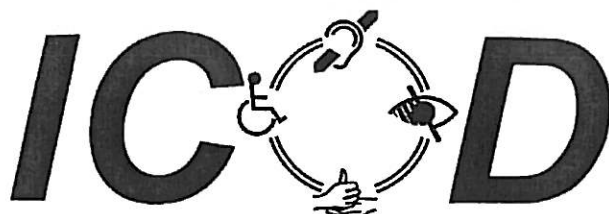
**Fraser Jarvie**

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**From:** Stuart Boyd  
**Sent:** 09 December 2013 15:38  
**To:** Fraser Jarvie  
**Subject:** Peugeot premier

Mr Jarvis

I believe you are considering the smaller wheelchair access cars for use as taxis in inverclyde as an operator of plate 224 I am in favour of this car as it is suited for wheelchair use as well as general use on ranks it can accommodate the customised chairs where purpose built taxis struggle with larger chairs it will also reduce running costs and operators carbon footprint Thank you Stuart Boyd Sent from my iPhone



*Inverclyde Council On Disability*  
"Connected, Confident and Included"

Fraser Jarvie  
Legal Services Manager  
Legal and Democratic Services  
Inverclyde council  
Municipal Buildings  
Clyde Square  
Greenock  
PA15 1LX



27/01/2014

Dear Fraser,

### **Public Consultation – Provision of Taxis, Wheelchair Accessible Vehicles**

With reference to your letter of 09/01/2014, I am writing to re-iterate ICOD's general support for the licencing of the smaller wheelchair accessible vehicles. As you are aware ICOD has previously taken part in practical consultations of the Peugeot vehicles, and our members response was overwhelmingly positive (copy of recent report enclosed).

We do however have concerns on the information that you included in the consultation letter. You state:

"Inverclyde council currently issues twenty licences specifically for wheelchair accessible vehicles, but at present only ten of those licences have vehicles operational".

ICOD are extremely disappointed that only 50% of current licenced WAV vehicles are available at present. As stated in previous correspondence, Inverclyde does not perform well compared to other local authorities in the licencing and provision of WAVs, based on 20 licenced vehicles, further diminution of this number on a practical is likely to leave wheelchair users in Inverclyde drastically under-provisioned.

ICOD would like clarification on the following issues:





- What steps have Inverclyde Council taken with reference to the licences issued for WAVs to ensure that vehicles and licences are in use?
- What provision is there under current regulations for action to be taken against licence-holders for WAV's who do not have operational vehicles?
- Of the ten vehicles not in use, what is the maximum and minimum length of time the licences for these vehicles have not, in effect, been in use?

Whilst the proposed smaller vehicles should prove suitable for the transport of wheelchair users, ICOD also recognise that there is a need for larger vehicle provision and strongly recommend that there is a mixture of vehicles, to meet the needs and demands of local disabled people.

Whilst we understand that the overall number of taxis licenced is not part of this review, ICOD would highlight once again the poor showing compared to other local authorities in the number of WAV's licenced, and given that only 50% of these are in use would suggest that Inverclyde Council require to do more in using their powers to ensure that all current licences are in use in the provision of WAVs.

Yours Sincerely, ,

Carol Kearns

Project Manager

Fraser Jarvie  
Inverclyde council  
Municipal Buildings  
24 Clyde Square  
Greenock  
PA15 1LY

## **Ref: Introduction of Peugeot Premier Vehicles**

**Dear Fraser**

ICOD Board and members welcome and support the introduction of the Peugeot Premier Vehicles 100%, to support and increase the existing wheelchair accessible vehicles that are on the road thus increasing the capacity and helping to reduce the barriers for local disabled people their families and carers.

ICOD and its service users have highlighted the need for many years for increased capacity of wheelchair accessible vehicles in Inverclyde.

The introduction of these vehicles will help to reduce the barriers and issues that local disabled people experience when accessing their communities.

Many of our service users and members of the public have reported to ICOD great difficulty in accessing wheelchair accessible vehicles, causing great concern and resulting in vulnerable people being left feeling vulnerable and unable to participate in community or family activities.

ICOD members and service users have experienced the following problems, which are related to the relatively low number of accessible vehicles available:

- **Accessible Vehicles not available**  
some members and service users have been told that no accessible vehicles are available when they call to book. This may be because there are no accessible vehicles on the road at that time, or because vehicles are being used on

contract or other work (ICOD Ltd are aware that some accessible vehicles are used on contracts with local Education services for example, and these vehicles are not available at certain times of day). Larger accessible vehicles are also popular with non-disabled people, for example larger parties going on a night out, visitors from cruise ships or families with luggage going to the airport. It is important to recognise that whilst a vehicle may be designed to accommodate wheelchair users, these vehicles may also be popular or needed by others in the wider community.

- **Waiting a considerably longer time for an accessible vehicle to arrive, in relation to the waiting time for an ordinary vehicle.**  
Depending on the number of vehicles on the road and the overall demand for an accessible vehicle at that time, a person often may have to wait for a driver to complete a current job, or drive a considerable distance from their current location to the person's pick-up point.
- **Not being able to book a wheelchair-accessible vehicle.**  
Some members have experienced problems pre-booking an accessible vehicle for a specific time, with the Taxi Company being unable to guarantee that an accessible vehicle will be on the road for the chosen time. ICOD recognise that the Taxi companies are not necessarily able to dictate to individual vehicle owners their times of work, and that this also hampers the ability to provide a 24hr bookable service. This problem however would be alleviated through the provision of more accessible vehicles in general.
- **No accessible vehicles available for return journeys**  
ICOD has heard first hand of numerous occasions where an individual has used an accessible vehicle for their outward journey, however when calling to book for their homeward journey have been told that there are no accessible vehicles on the road.

These incidents generally happen on evenings and weekends, and in 2 specific cases, one lady had to spend the night on her friends sofa (which given her disability was extremely uncomfortable and detrimental to her condition), and another individual was left stranded in Greenock Town

Centre at 10pm at night in the dark, having to make her way home alone. This was despite having pre-booked an accessible vehicle for their return journey. Incidents such as these dissuade disabled people from using taxi services again, hampering their ability to get out and about and increasing their isolation.

All of these issues would lead ICOD Ltd to conclude that there is currently not an adequate provision of accessible vehicles available and with the introduction of these additional wheelchair accessible vehicles this should help eliminate some of these problems.

ICOD service user have been involved in a pilot test of the Peugeot vehicles on 2 occasions and a report was submitted on both occasions supporting these use of these vehicles.

ICOD strongly feel that the introduction of these vehicles will not only benefit local disabled people their families and carers but will benefit the service providers.

ICOD Ltd would encourage Inverclyde Council to build on existing incentives and adopt further measures to increase the provision of accessible vehicles.

Thanks & Regards

Carol Kearns

Project Manager  
Inverclyde Council On Disability  
10 Clyde Square  
Greenock  
PA15 1NB

**Inverclyde Council on Disability Ltd**

**Report to: Cllr Ronnie Ahlfeld**

**Subject: Provision of MAV (Peugeot Premier Vehicle)**

**Report By: Project Manager**

**Date: 17/06/2013**

**Introduction**

ICOD has long been aware of the need for more wheelchair accessible taxis in Inverclyde through the experiences of our service users and members.

ICOD staff, service users and board members were invited to participate in a consultation and trial of the accessibility of proposed new accessible vehicles on Wednesday 26<sup>th</sup> January 2011, 2 Powerchair Wheelchair users and one manual wheelchair user attended the meeting and trialled these vehicles

The feedback given at the time of trial is detailed below:

	<b>Positives</b>	<b>Concerns</b>
Entering & exiting the vehicle	Each participant felt very safe when entering and exiting the vehicle they felt reassured of their safety due to safety straps being attached to their wheelchair. Each participant also commented on the ramp and that they felt safe as the ramp in the new vehicle is not as steep as the ramp on the current WAV. Each participant also liked that it was a rear entry system to	ICOD's concern is that all drivers are trained appropriately to assist users entering and exiting the WAV safely and securely as previous experience with WAV is that not all drivers are trained effectively when assisting wheelchair users. ICOD also have concerns with the height of the entrance

	<p>the vehicle and felt that it was a more smother and fluent transition process as in previous experience with WAV ramps drivers will ask users to move a little in certain directions and in some experience the ramps have not been suitable for Power wheelchairs</p>	<p>door for larger powered wheelchairs and would propose for the vehicle to be tested by members of the community who use larger orthopaedic wheelchairs.</p>
<p><b>Safety features</b></p>	<p>Users felt reassured and safe when inside the vehicle knowing that there were a variety of clamps, seat belts in place to stop the wheelchair from moving when inside the vehicle.</p>	<p>ICOD's would propose that all drivers be appropriately trained in using the safety features. Service users have previously experienced safety issues when travelling in currently WAV where drivers have failed to secure their wheelchair in place causing movement throughout the journey.</p>
<p><b>Seating Space for other passengers</b></p>	<p>Users advised that the seating was comfortable and spacious. Users also reported that it felt like they were more in a standard car rather than a big uncomfortable vehicle,</p>	<p>Users and ICOD's concerns are that in current WAV 1 wheelchair users and 3 other passengers can travel in the same vehicle, the new WAV would only allow capacity for 1 wheelchair user and 2 passengers as long as the front passenger seat can be used. There was also concerns if someone who uses a large orthopaedic chair that there would only be</p>

		<p>space for 1 passenger in the front to accompany them. There were concerns that a wheelchair user wanted to travel with more than 2 friends then they would require 2 taxis. and again</p>
<p><b>Storage space for luggage etc</b></p>	<p>Adequate space for shopping and bags for everyday trips.</p>	<p>Users advised that if a net bag was fitted to allow for storage of shopping containing all their shopping in one space. They did express that there was less storage space than the current WAV and advised that if they required a lot of storage space for luggage i.e. if going on holiday they these cars would not be suitable.</p>
<p><b>Cost</b></p>	<p>Multi Purpose Vehicles (WAV's) are about £10k plus cheaper than other WAV's thus taking them more within the reach of many operators pockets and that they have better mileage consumption. Both points therefore making them more attractive and not much more costly than a new saloon car.</p>	

### **Evidence of Need**

From national statistics gathered in 2009, Inverclyde has 17 Licensed Public WAVs (7% of total licensed fleet) licenced Private Hire WAVs (2.4% of total licenced fleet. This equates to 21 WAV vehicles in total, 5.16% of all licenced vehicles.

On the same 2009 figures, the average WAV provision across 31 local authorities was 15.85% (public taxis and private hire).

Provision across Scotland varies enormously, with some local authorities (Shetland, Argyll and Bute) reporting no provision and others such as Edinburgh City and Glasgow reporting 100% WAV Public licenced Taxis.

It is acknowledged that Inverclyde has generally higher levels of disability compared to many other local authorities, yet the provision of WAV is only 1/3 of the current national average.

Inverclyde ranks 20<sup>th</sup> out of 31 local authorities in the % of WAV provided compared to total fleet numbers.

ICOD would contend that based on this national comparison, there is evidence that WAV provision locally is not in line with at least the national average.

### **Summary:**

All users were happy with the safety features within the car and the gradient of the ramp was within standards and allowed for powered wheelchairs and manual chairs to access the vehicle safely and securely.

ICOD would propose that all drivers be trained to effectively and efficiently operate the safety features and to be able to assist passengers into the WAV safely and with ease. ICOD would also like to propose that all new drivers using the WAV are suitably trained before driving the vehicle as some drivers may drive a variety of vehicles, it would also be beneficial to periodically provide refresher training for all drivers.



ICOD would also propose that these vehicles are to replace standard 4 seater taxis and NOT the existing WAV E7 fleet as a variety of transport for varying needs is beneficial.

Increasing the number of accessible vehicles will also allow those who require the use of WAV the safety and security of being able to access a taxi. As previously mentioned many of our service users have experienced difficulty in accessing a WAV and have in many occasions have been in a predicament where they have been stranded and felt vulnerable and unsafe. Many of our service users have also experienced situations when a WAV has refused to take the passenger due to the ramp being unsuitable for powered wheelchairs. The addition of these WAV would allow for passengers who use powered wheelchairs and manual wheelchairs peace of mind knowing that the ramps are accessible and that there an increased number of WAV on the road.

ICOD also suggest that a step and a grab rail be fitted to the WAV for those passengers that have ambulant mobility to allow for ease of access to and from the vehicle.

ICOD would also propose we consult residents at MacElhose Court on the accessibility of these vehicles as a number of their residents use a range of wheelchairs. If possible to have the taxi company take along the WAV to MacElhose court and allow residents to assist with the feedback of the accessibility of these WAV.

ICOD would welcome the proposal and introduction of this MAV Peugeot Vehicle ensuring that there are more accessible vehicles available and a variety of vehicles that meets the needs of able bodied and wheelchair users clients.

Thanks & regards

Carol Kearns

Project Manager  
Inverclyde Council on Disability



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Ref: FJ/DS

23<sup>rd</sup> January 2014

Mr Fraser Jarvie  
Legal Services Manager  
Legal and Democratic Services  
Inverclyde Council  
Municipal Buildings  
Clyde Square  
Greenock  
PA15 1LX

Dear Mr Fraser,

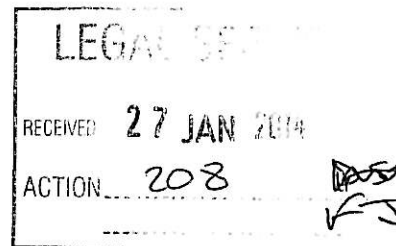
Public Consultation  
Provision of Taxis  
Wheelchair Accessible Vehicles

Thank you for allowing us to take part in the public consultation on this matter.

Our view is we keep to the present vehicle standard. We've been informed of instances when other types of taxi, other than the present standard has had to be used, and these have not been suitable. Therefore our view is not to change the current criteria to allow a smaller vehicle.

Yours sincerely

L. Galloway  
Secretary





*spinal injuries association*

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Mr F Jarvis  
Legal Services Manager  
Legal and Democratic Services  
Inverclyde Council  
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PA15 1LY

16/01/2014

Dear Mr Jarvis

Thank you for your recent correspondence with regards to our associations view on wheelchair accessible taxis.

Please find enclosed a copy of the Spinal Injuries Association Taxi Charter which outlines our policy's on wheelchair accessible taxis.

If you have any further queries for not hesitate to contact us.

Your sincerely

*Catherine Stribling*

**Catherine Stribling**  
**Public Affairs Communications Officer**

LEGAL SERVICES	
RECEIVED	17 JAN 2014
ACTION	129 FJ

Rebuilding lives after spinal cord injury - [www.spinal.co.uk](http://www.spinal.co.uk)

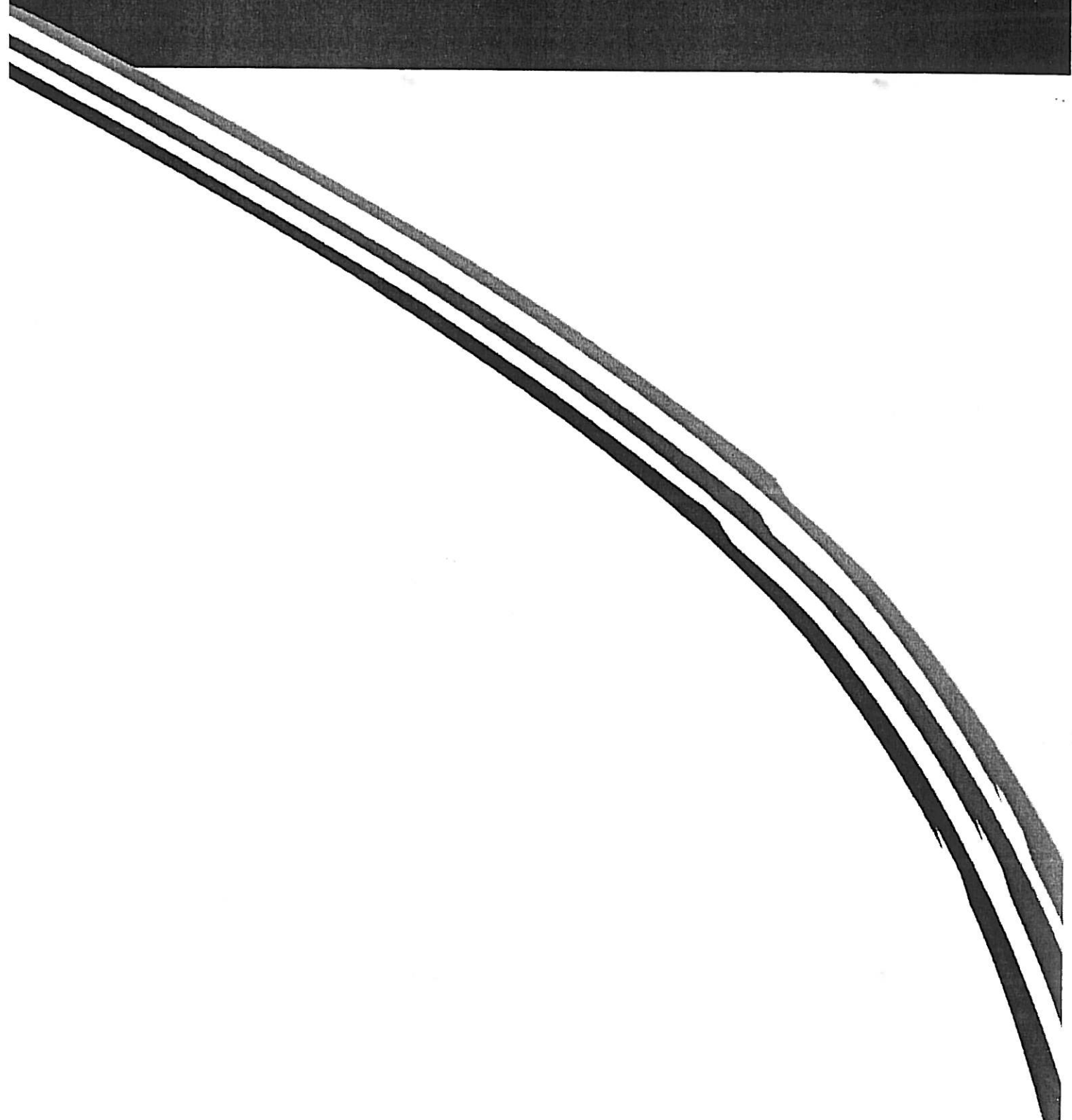
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# Taxi Charter





### **Spinal Injuries Association Taxi Charter**

In its Campaigning for Change Manifesto 2009 – 2011, the Spinal Injuries Association (SIA) addressed the challenges that public transport and, in particular, taxis, present to those with spinal cord injuries (SCI).

Section 36 of the Disability Discrimination Act 1995 (DDA) introduces legislation to make taxis accessible for disabled people. However, this is still to be enacted by government. The delay in its implementation appears to be the technical specifications which define a “wheelchair accessible taxi” and the cost to the taxi trade of providing these vehicles.

In this document SIA puts forward an “**Accessible Taxi Charter**” to address the challenges currently facing those with SCI and other disabled taxi passengers in the U.K.

## The Present Problems

- Vehicle types used for taxis differ across the country.
- The number and availability of wheelchair accessible taxis differ from area to area.
- Often drivers have no disability awareness training or are unaware how to operate equipment like ramps and clamps.
- This equipment is often in poor working condition or has been mislaid and is not with the vehicle.
- Wheelchair accessible vehicles licensed by local authorities may not be of a suitable specification.
- There is no standardised complaints procedure or enforcement for bad service.

## Desired Outcomes

SIA will be pressing for improved and compulsory driver training which will ensure:

- Drivers better understand the needs of their disabled passengers.
- Drivers are able to operate and maintain equipment properly.

SIA will also be pressing that via the licensing system:

- All vehicles working from official taxi ranks meet a minimum standard that enables it to carry a passenger safely in their wheelchair.
- Wheelchair accessible vehicles are provided with side access off the kerb side to provide direct access to/from the pavement.
- The built environment which is used for taxi ranks is suitable to allow easy and safe access for wheelchair users to the taxi, such as raised platforms at taxi ranks.
- There are sufficient wheelchair accessible taxis working away from a taxi rank to ensure that disabled people can obtain a vehicle that meets their needs.
- The level of accessible vehicles should be greater than those not capable of carrying a wheelchair user seated in their wheelchair.
- Taxi operators have a duty to provide an equal service for disabled and non disabled people.
- There is a standardised, enforced complaints procedure across all local authority areas.
- Taxi operators refusing to provide a service to disabled people are suitably punished to deter repeat offences.

## Charter

SIA believes that these recommendations will improve access for all disabled taxi passengers.

- All taxis (hackney carriages) should become side loading wheelchair accessible vehicles and cater for every disabled person.
  - All taxi drivers should be thoroughly trained in disability awareness and the competent use of the facilities in their vehicles.
  - The single specification for accessible taxis must be demonstrably safe in all respects and converted vehicles should not be tested to a lower safety standard than that used by saloon cars.
  - Standards should be deliverable in the short term by manufacturers and converters and also be affordable so as to ensure a quick delivery of the DDA requirements.
  - Accessibility standards should enable wheelchair users to access an integrated transport system, allowing an uninterrupted journey on trains, buses and taxis.
  - Authorities should ensure street planning and rank provision meet the need of disabled passengers.
  - Licensing authorities must ensure that drivers of accessible taxis do not discriminate against disabled people under the DDA.
1. Under the proposals of the DDA, it was envisaged that all taxis (hackney carriages) should become wheelchair accessible and meet a predetermined specification. It was envisaged that the trade would be given a ten year period to achieve this and SIA believes that this must commence as soon as possible.
  2. The Department for Transport has suggested that a mixed fleet of saloon cars and wheelchairs accessible taxis within the hackney carriage fleet is an option for meeting the needs of wheelchair users. SIA does not believe that this is practical or desirable and will seek to show why in this charter.
  3. SIA believes it is imperative that all taxi drivers are required to be trained in disability awareness and assisting disabled passengers safely into and out of their taxis. This is a major issue both in terms of safety for disabled passengers and the willingness of drivers to undertake journeys with wheelchair users.
  4. If a taxi driver refuses to take a wheelchair passenger then this should be treated as an offence under the DDA. SIA believes that if all drivers are properly trained then such situations need never arise.

## Critical Issues

The huge variety of accessible taxis in the marketplace can present disabled passengers with a poor, and in some circumstances unsafe, choice of vehicle. To address this issue SIA proposes the following:

### Safety

- The European Community provides a "Type approval" system for the production of all cars, called "European Whole Vehicle Type Approval". Vehicles that are converted to accommodate wheelchair users can currently be tested to Single Vehicle Type Approval after conversion, which is a national standard. SIA does not believe that this is acceptable for a public service taxi. All such converted taxis should be re-tested to fully European Whole Vehicle Type Approval.
- SIA believes that side loading should be the standard adopted as the safest method of accessing taxis from taxi ranks and the street. The advantages of side loading are that:
  - It is safer to keep wheelchair users on the pavement than to put them in the road, particularly facing away from on coming traffic.
  - Taxi drivers may not be familiar with lowering a wheelchair over a kerb which can present dangers to the passenger. Similarly, passengers using electric wheelchairs may find it impossible to go down over a kerb. If access is from the pavement then these issues do not arise.
  - Being seated in the centre of a taxi is likely to be safer than being seated at the rear of the vehicle. The majority of accessible taxis have centre divisions which would provide passenger protection in the event of a side impact. However, most rear loading taxis leave the wheelchair passenger at the back of the vehicle in the rear impact zone.
  - The need to have an alternative exit in the event of an accident is paramount. In an emergency a side loading vehicle will offer the passenger the opportunity to exit the vehicle from an alternative exit. In the case of a rear loading vehicle where the rear doors or tailgate are damaged, this would be impossible. This is not acceptable for a public service vehicle.
- An agreed Government specification will deliver additional safety to passengers. Local authorities may currently license accessible vehicles to a range of technical specifications which may be inappropriate and potentially dangerous.



## The Right Specification

- One of the critical concerns of disabled people is the need for an integrated transport system so that journeys can be completed without disruption. The taxi is unique in delivering door to door transport and therefore needs, at the very least, to provide the same accessibility standards provided by buses and trains under the DDA.
  - The reference wheelchair measuring 1200 x 1350 x 700mm formed the basis of accessibility standards for buses and trains and SIA sees no reason not to adopt that same standard within the rear cabin of a taxi.
  - SIA understands that there are already many conversions in the marketplace that meet this standard. This demonstrates not only that this specification is achievable by converters, but that it is also presumably affordable by the taxi trade.
  - Accessibility for ambulant disabled passengers is a key issue. At present the purpose built taxi provides a swivel seat and demountable step on every vehicle. If this were replicated by converters it would address the perceived difficulty by ambulant disabled passengers of using accessible taxis.
  - Affordability is clearly a key issue for the taxi trade. However, there are currently many cities with satisfactory accessibility standards for their vehicles. It seems logical that if this specification can be afforded in these towns and cities then it should be possible across the country. Rural areas may present more of a challenge to the trade as income may be lower, but SIA understands that drivers in these areas commonly purchase second hand vehicles and would therefore be likely to purchase second hand accessible vehicles when the DDA requirements are introduced.

## **The Mixed Fleet Issue**

The Department for Transport has suggested that a mixed fleet of saloon cars and wheelchair accessible taxis may meet the needs of disabled passengers. SIA does not agree with this proposal for the following reasons:

- Under the DDA the choice of saloon car was envisaged as being provided by private hire. The taxi was instead seen to provide instant accessibility on the rank as part of an integrated transport system. This ensured that a wheelchair user was in no way disadvantaged when taking a taxi from the rank.
- It is not clear how a local authority can decide who will drive an accessible vehicle and who will drive a saloon car. Accessible taxis are of necessity more expensive to operate and this is likely to lead those driving accessible vehicles to revert to saloon cars over time. SIA does not want to see 100 per cent accessible taxi fleets gradually erode away. Any solution to this problem is likely to require new legislation, and will further delay implementation of the DDA.
- To overcome the concerns of those calling for the mixed fleet, the specification of any future taxi should take into account the needs of wheelchair users, ambulant disabled passengers, the elderly and those with other requirements.

## **Driver Training**

SIA believes that all taxi drivers should be trained in dealing with disabled passengers. SIA therefore recommends that:

- All drivers must undertake disability awareness training as a condition of their licensing.
- All drivers must demonstrate that they have full working knowledge of the equipment fitted to their taxi. This should include the ability to safely load and secure a wheelchair and assist passengers with other mobility requirements.

## Local Authorities

Local authorities could ensure that accessibility to taxis is made easier for disabled passengers in some very simple ways. The following key principles should be a requirement on all authorities.

- Taxis on taxi ranks should always be accessible from the near side.
- Ranks should have raised pavements at the point of entry so as to minimise ramp angles and step height.
- Cover should be provided for passengers at ranks where waiting is a frequent occurrence.
- Rank availability should take into account the needs of disabled passengers. For example, ensuring that hospitals have accessible taxi ranks near to the main entrance.

SIA would also like to see the introduction of a standardised, enforced complaints procedure across all local authority areas. This will ensure that disabled people can be confident that their complaints will be handled effectively. It would also ensure that offending taxi operators are suitably punished and that disability discrimination is taken seriously by the industry.

## Timing

The DDA envisaged a ten year changeover to the new specification when agreed. Given that the specification has yet to be decided, SIA urges that:

- The new specification be agreed as soon as possible based around vehicles that are currently in the marketplace and can meet the requirements outlined above with limited improvements.
- All vehicles that do not meet the final specification should be required to do so when the owner next changes the vehicle. This will prevent saloon cars being kept on the road and changed only at the last possible date.
- All authorities should only issue new licences for wheelchair accessible taxis that meet the agreed standard.

**SIA anticipates that this Charter will act as a benchmark for Government, Licensing Authorities, manufacturers and converters and members of the taxi trade. Please help us to deliver it as soon as possible.**

**For more information please contact**

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Registered Charity No 1054097  
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22<sup>nd</sup> January 2014

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### Public Consultation/Provision of taxis/Wheelchair Accessible Vehicles

Dear Fraser,

In response to your letter, 9/1/14, I would like to state that I, and all concerned at ABC Supported Living, would welcome the provision of wheelchair accessible taxis, in what ever form is available; large or as proposed smaller vehicles. There is a lot more I could add, but I won't, as you have requested that I don't.

I would add that an open discussion on the provision of wheelchair taxis within Inverclyde is over due and needed, as the service is inadequate. I would appreciate if these comments could be passed on, as a general concern.

Yours Sincerely,

William Dalglish/Project Manager.